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1 2 3 4	Steve S. Gohari, Esq. (SBN 189339) LAW OFFICES OF STEVE S. GOHARI 21550 Oxnard St. 3 rd Floor Woodland Hills, California 91367 Telephone (818) 224-6647 Facsimile (818) 530-7748 bkgohari@gmail.com	<u>I</u>	
5	Attorney for Plaintiffs		
6	UNITED STATES DISTRICT COURT		
7	NORTHERN DISTRICT OF CALIFORNIA		
8			
9	GERMAN SALCIDO	CASE NO.: 4:13-CV-03450-SBA	
10			
11	Plaintiff,		
12	vs.	STIPULATION AND [PROPOSED] ORDER EXTENDING PLAINTIFF'S TIME TO FILE	
13	VERICREST FINANCIAL & SUMMIT	OPPOSITION TO DEFENDANT'S MOTION TO	
14	MANAGEMENT COMPANY LLC; and DOES 1-100, INCLUSIVE	DISMISS AND EXTENDING DEFENDANT'S TIME TO REPLY TO PLAINTIFF'S	
15	Defendants.	OPPOSITION TO DEFENDANT'S MOTION TO DISMISS	
16	Defendants.		
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22	Plaintiff GERMAN SALCIDO (Hereinafter "Plaintiff"), and Defendants VERICREST		
23	FINANCIAL & SUMMIT MANAGEMENT COMPANY LLC., (collectively, "Defendants"),		
24	by and through their counsel of record, STIPULATE AND AGREE as follows:		
25	WHEREAS, Plaintiffs can file their OPPOSITION TO DEFENDANT'S MOTION TO		
26	DISSMISS in this action on or before, Monday, September 23, 2013; and Defendants can file		
27			
28	STIPULATION AND [PROPOSED] ORDER EXTENDING PLAINTIFF'S OPPOSITION TO DEFENDANT'S		
	MOTION TO DISMISS CASE NO. 3:13-CV-03450-CRB		

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1	their REPLY to PLAINTIFF'S OPPOSITION TO DEFENDANT'S MOTION TO DISMISS or		
2	or about Monday, September 30, 2013.		
3	WHEREAS, the Parties are engaged in discussions to resolve this matter amicably;		
4	WHEREAS, the filing of the requested herein is not requested for the purpose of delay		
5	and will not result in prejudice to the Parties or the Court.		
6	NOW THEREFORE, Plaintiff and Defendants agree to the filing of the OPPOSITION		
7	TO DEFENDANTS MOTION TO DISMISS BY September 23, 2013, and to the filing of the		
8	REPLY to the Opposition by September 30, 2013.		
9 10			
11	IT IS SO STIPULATED		
12			
13			
14	Dated: September 18, 2013	By: /s/Steve S. Gohari	
15		Steve S. Gohari	
16		Attorney for Plaintiffs	
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18			
19	Dated: September 17, 2013		
20		By: /s/ Daniel D. O'Shea	
21		Daniel D. O'Shea	
22		Attorney for Defendants	
2324			
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[PROPOSED] ORDER Pursuant to the Stipulation of the parties and good cause appearing, IT IS ORDERED that Plaintiffs shall file their OPPOSITION TO DEFENDANT'S MOTION TO DISMISS no later than September 23, 2013, and Defendant's file their REPLY TO PLAINTIFF'S OPPOSITION by September 30, 2013. Dated: <u>9/19/2013</u> Sandre B. Ormika U.S DISTRICT JUDGE